

Exhibit D to Joint Pretrial Memorandum
(The Defendant's Exhibit List)

<u>Def's No.</u>	<u>Document Description</u>	<u>Plaintiff's Objections</u>
DEF'S 1	February 22, 2029 Reclamation Demand Letter with Exhibits	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge.
DEF'S 2	Invoice/Bill of Lading Detail Printed February 10, 2021	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 3	Balance of Yellow, Purple, Green and Orange Bills of Lading	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 4	Blue Bills of Lading	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 5	POD Packet A-Green	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.

<u>Def's No.</u>	<u>Document Description</u>	<u>Plaintiff's Objections</u>
DEF'S 6	POD Packet B-Green	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 7	POD Packet C-Green	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 8	POD Packet D-Green	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 9	POD Packet E-Green	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 10	POD Packet F-Green	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.

<u>Def's No.</u>	<u>Document Description</u>	<u>Plaintiff's Objections</u>
DEF'S 11	POD Packet G-Green	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 12	POD Packet H-Green	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 13	POD Packet I-Green	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 14	List of 90 Day Payments Part 1	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 15	List of 90 Day Payments Part 2	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.

<u>Def's No.</u>	<u>Document Description</u>	<u>Plaintiff's Objections</u>
DEF'S 16	Invoices 2-12-2019 to 5-11-2019 1	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 17	Invoices 2-12-2019 to 5-11-2019 2	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 18	Postpetition Activity Part 1	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 19	Invoices listing attached to 4/26/21 email	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.
DEF'S 20	Postpetition Activity Part 2	Best Evidence Rule. Hearsay. Foundation, including lack of personal knowledge. Relevance. Authentication.

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